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*Counsel for Defendants,
Vijaya Gadde and Twitter, Inc.*

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

DANIEL D'AMBLY,

Plaintiff,

v.

CHRISTIAN EXOO a/k/a ANTIFASH
GORDON; ST. LAWRENCE UNIVERSITY;
TRIBUNE PUBLISHING COMPANY; NEW
YORK DAILY NEWS; VIJAYA GADDE;
TWITTER, INC; COHEN, WEISS AND SIMON,
LLP;

Defendants.

Civil Action No: 2:20-cv-12880-JMV-JAD

**APPLICATION FOR A
CLERK'S ORDER EXTENDING TIME
TO ANSWER OR OTHERWISE
RESPOND PURSUANT TO LOCAL
CIVIL RULE 6.1(b)**

Application is hereby made to the Clerk of the United States District Court for the District of New Jersey by the undersigned attorneys for VIJAYA GADDE and TWITTER, INC. ("Defendants"), for an extension of time within which to answer or otherwise respond to the Complaint herein for a period of fourteen (14) days pursuant to Local Civil Rule 6.1(b), but not for the purpose of appearing either generally or specifically in this jurisdiction; and it is represented that:

1. There have been no prior extensions of time to answer or otherwise respond granted to these Defendants;

2. Counsel for Plaintiff has advised counsel for Defendants that copies of the Complaint and Summons were sent via certified mail to the Headquarters for Twitter, Inc. located

in San Francisco, California and to the Corporate Trust Company located in Delaware. Counsel for Plaintiff states that he has received confirmation, in the form of a green return card, for the mail sent to the Headquarters for Twitter, Inc. While counsel stated that there is no date on the green return card, he stated that the Complaint and Summons probably arrived around September 25, 2020. Counsel for Plaintiff further stated that he had not received confirmation for the mail sent to the Corporate Trust Company.

3. Defendants do not waive their right to challenge service of process or jurisdiction in this matter;

4. In the absence of extension, including further extensions to which the parties anticipate stipulating, Defendants' responsive pleading, based upon the date provided by Plaintiff's Counsel on which he states the Complaint and Summons were delivered to the Headquarters for Twitter, Inc., would be due on or before October 16, 2020; and

5. The time to respond to the Complaint has not yet expired.

WHEREFORE, Defendants VIJAYA GADDE and TWITTER, INC. respectfully request the time to answer or otherwise respond is extended for a period of fourteen (14) days up to and including October 30, 2020 pursuant to Local Civil Rule 6.1(b) of the United States District Court for the District of New Jersey.

By: /s/Lawrence S. Lustberg
Lawrence S. Lustberg, Esq.

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Dated: October 16, 2020

The above application be and hereby is **GRANTED** and the time to answer or otherwise respond is extended for a period of fourteen (14) days up to and including October 30, 2020

pursuant to Local Civil Rule 6.1(b) of the United States District Court for the District of New Jersey.

WILLIAM T. WALSH, Clerk of the United States
District Court, District of New Jersey

By: _____
Deputy Clerk

Dated: October 16, 2020